

HB1232: Health Occupations- Pharmacists- Administration of Vaccines

UNFAVORABLE

Love Maryland PAC

Dear Chair Pena-Melnyk, Vice Chair Cullison, and Distinguished Members of the House HGO Committee,

The Love Maryland PAC asks for an UNFAVORABLE report on HB1232 for the following reasons:

1. Best Health Outcomes- The best health outcomes for children occur when the parent and the physician work as a team and consider health history, precautions, and contraindications before making any medical decisions. Children are not vaccinated like adults and have a very complex recommended schedule, receiving multiple shots at once. Should this bill ever pass, children will miss out important well child visits with their pediatricians. Pediatricians perform a comprehensive assessment of the whole child including screening for growth issues, heart irregularities, neurodevelopmental delays and in the adolescent years screening for signs of abuse, mental health concerns, and scoliosis. If childhood vaccines are given in a pharmacy in our state, parents will stop taking their children for pediatric visits.

2. Training- Pediatricians are specifically trained to assess children for vaccine appropriateness and readiness. Immunizations are pharmaceutical products that come with warnings, precautions, and contraindications. A child must be properly assessed prior to administration to reduce risk for serious harm and/or death. A pharmacist does not have this training and will not acquire it with 20 hours of education as the bill proposes.

3. Immunet/ Missing State Study- In 2021 the Federal PREP Act did allow pharmacists to vaccinate children as young as 3 as part of the emergency measures to deal with the Covid pandemic. The state of Maryland legislated a study of this time period to gather information. This study has not been done! A preliminary study showed a sharp decrease in reporting to Immunet from 2018-2020. A 2017 Maryland law required that all vaccine providers report that vaccine in the state's Immunet system. In 2018, about 70% of providers were reporting. By 2020, this number fell to 47%. One difference is that pharmacists started administering more vaccinations during this time. SB 372 can never be considered without the state's study.

4. Liability- The Federal 1986 National Childhood Vaccine Injury Act removed liability from vaccine makers as well as the provider that administers the vaccine for any shot on the Childhood Schedule. Pharmacists have not been trained in assessment for childhood vaccines and will not be liable for any mistake that they make with children. This puts children at risk.

5. Pharmacies Are Chaotic- Pharmacies have a reputation for being chaotic. Pharmacist's jobs are harder than ever as so many people are on multiple pharmaceutical products. It is dangerous to have pharmacists stop filling a prescription every time they have to give shots. A screaming toddler or preschooler should not be assessed for vaccine appropriateness in the middle of a crowded Walmart.

6. Improper Injections- SIRVA (Shoulder Injury Related to Vaccine Administration) have risen dramatically since pharmacies started giving vaccinations. A skyrocketing number of cases have been compensated by the Federal Government as people are getting their shots outside of their doctor's offices.

7. Pediatric Care- People who become pharmacists are smart enough to have gone to medical school, physician assistant training, and/or nursing school. Many chose the pharmacy profession because they did not have an interest in direct patient care. They certainly did not choose to go into pediatrics which requires a level of patience and an ability to make a child feel safe and comfortable that cannot be taught. Not all pharmacists want to do direct patient care with screaming children.

We ask the committee for an UNFAVORABLE report. This bill is a solution looking for a problem, as children can already receive their vaccinations in an urgent care setting where they will also get basic vital signs and assessment by a licensed caregiver.

Please see following attachments as evidence for the above statement.